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## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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**BROOKLYN OFFICE** 

Joh Q. Wright's Request to the Clerk for Issuance of Subpoena to Etsy, Inc. pursuant to 17 U.S.C 17 U.S.C. 512(h) to Identify

**Alleged Infringers** 

In Re: DMCA Subpoena to Etsy, Inc.

Petitioner, Jon Q. Wright ("Wright"), through their undersigned counsel of record, requests that the Clerk of this Court issue a subpoena to Etsy, Inc. ("Etsy") to identify alleged copyright infringers, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (the "DMCA Subpoena"). A proposed DMCA Subpoena is attached.

Wright has satisfied the requirements of the issuance of a subpoena pursuant to 17 U.S.C. § 512(h) by:

- (1) Filing a copy of the notifications sent to Etsy, pursuant to 17 U.S.C. § 512(c)(3)(A), attached to the Declaration of Dmitry Lapin as Exhibit A;
  - (2) Filing the proposed DMCA Subpoena; and
- (3) Filing a sworn declaration confirming that the purpose of the DMCA Subpoena is to obtain sufficient information the identity of the alleged infringers and that such information will only be used for the purpose of protecting Wright's rights under 17 U.S.C. § 101, et seq.

As Wright has complied with the statutory requirements, Wright respectfully requests that the Clerk issue the proposed DMCA subpoena, pursuant to 17 U.S.C. § 512(h)(4).

Dated: June 29, 2022

Respectfully Submitted,

/s/ Dmitry Lapin
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